



DEMETER ASSOCIATION, INC.

For Certification of BIODYNAMIC AGRICULTURE

5579 '99 APR 13 AIO:11

April 5, 1999

Food and Drug Administration
Dockets Management Branch
Room 1-23
12420 Parklawn Drive
Rockville, MD 20857

Re: docket #98P-1194
To whom it may concern:

I write in support of a petition filed December 15, 1998 by the Center for Food Safety which asks FDA to withdraw approval of the livestock drug rBGH, aka BST.

Demeter Association, Inc., which I represent, is the U.S. branch of a worldwide movement for certification of Biodynamic farms and processors. Biodynamic agriculture and Demeter certification have existed for about 75 years. In fact Biodynamics is perhaps the oldest and foremost alternative agricultural method. Demeter certification was the first farm and food certification system based on natural production methods and environmental concerns. One of the precepts and prerequisites of Demeter certification is that all processes and materials come from the realm of what is living in nature, not what is dead, or artificially synthesized.

We cite the following as reasons for FDA to withdraw approval of rBGH:

- a. Research on which approval was based was incomplete.
- b. FDA relied exclusively on research done by the company seeking approval of its product.
- c. The swinging door between FDA and the industry it regulates represents a major conflict of interest.
- d. rBGH is not needed. There is a surplus of raw milk in the country. For years USDA has bought up raw milk supplies and given them away in order to support the price of fluid milk. There is no need for a product whose sole purpose other than profit for Monsanto is to increase milk production.
- e. rBGH has a detrimental effect on cow health. It results in more mastitis, topical infection, and shorter lives for the animals.
- f. There is mounting suspicion that milk from cows treated with rBGH causes increased incidence of cancer in humans, particularly prostate and breast cancers, two cancers which appear to be on the increase.
- g. The sole justification for approval of this product is profit for Monsanto.
- h. There is no concern for human and animal health which is FDA's mandate.
- i. rBGH represents a de-naturing of nature. The long term consequences of this manipulation are unknown and could be wide reaching.

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- j. Approval of rBGH without labeling requirements has caused the entire dairy consuming population to participate in an experiment that they have no way to avoid or control. A basic freedom to choose what one wishes to consume has been preempted.

Cancellation of approval for rBGH will send a message that FDA does care about consumers. Our certified farms and their customers will feel that FDA has done something for them.

I urge you to act in the best interests of the majority of human beings whose health and well being are in your hands.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anne Mendenhall', with a large, stylized initial 'A'.

Anne Mendenhall
Director



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**BRITT ROAD
AURORA, NY 13026**



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